

JG:SD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-224

- - - - -X

UNITED STATES OF AMERICA

- against -

C O M P L A I N T
(21 U.S.C. §§ 952(a)
and 960)

CARLOS RAMIREZ-ZULUAGA,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ROMONA SY, being duly sworn, deposes and states that he is a Special Agent with Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

Upon information and belief, on or about March 1, 2010, within the Eastern District of New York and elsewhere, defendant CARLOS RAMIREZ-ZULUAGA did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On March 1, 2010, defendant CARLOS RAMIREZ-ZULUAGA arrived at John F. Kennedy International Airport in Queens, New York, aboard Avianca Flight No. 20 from Bogota, Columbia.

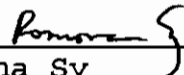
2. A Customs and Border Protection Inspector ("CBP") noticed that the defendant had multiple entries into New York, specifically, four trips in the last few months. In addition, defendant had no checked luggage.

3. The defendant was questioned by CBP agents and stated that he was in New York City for business. The defendant, however could not provide CBP agents with any contact information for people he was planning to meet with nor the purpose of his business. A pat down was conducted of the defendant which had negative results.

4. The defendant was transported to the medical facility at John F. Kennedy International Airport. After being admitted, the defendant admitted to swallowing 131 pellets. An x-ray was taken of defendant's intestinal tract, which was positive for foreign bodies.

5. Commencing March 1, 2010, the defendant passed a total of 131 pellets with a total gross weight of approximately 2 kilograms of heroin. In addition, after being read his Miranda warnings, the defendant admitted to smuggling narcotics into the United States.

WHEREFORE, your deponent respectfully requests that defendant CARLOS RAMIREZ-ZULUAGA be dealt with according to law.



Romona Sy
Special Agent
Drug Enforcement
Administration

Sworn to before me this
5th day of March, 2010

GE
:
